

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	Case No. 4-15-05280
KEITH A. HOOVER,	:	
Debtor	:	
	:	Chapter 13
CHARLES J. DeHART, III, CHAPTER 13	:	
TRUSTEE,	:	
Movant	:	
Vs.	:	
	:	
KEITH A. HOOVER,	:	
Respondent	:	

ANSWER TO TRUSTEE'S MOTION TO DISMISS CASE

COMES NOW, Keith A. Hoover, Debtor herein, by his attorneys, the law firm of Stover, McGlaughlin, Gerace, Weyandt & McCormick, P.C., and, for his Answer to the Motion of the Trustee To Dismiss Case, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied as stated. The Debtor will file an amended Plan shortly.
4. Denied as stated. The Debtor's amended plan will provide for the full payment of priority claims and will be feasible.

WHEREFORE, Keith A. Hoover, Debtor herein, respectfully requests that this Court deny the relief requested in the Trustee's Motion and for such other and further relief as is equitable and just.

Respectfully submitted,

STOVER, McGLAUGHLIN, GERACE,
WEYANDT & McCORMICK, P.C.

By: /s/ Donald M. Hahn
Donald M. Hahn (PA Bar ID 66398)
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(814) 355-8235
Attorney for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing documents upon the person(s) and in the manner indicated below:

Service by ECF Filing Notice as Follows:

Charles DeHart, III, Esquire
Chapter 13 Trustee

DATED this 22nd day of March, A.D., 2018.

/s/ Donald M. Hahn